

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

INGENICO INC.,

Plaintiff,

v.

IOENGINE, LLC,

Defendant.

C.A. No. 18-826-WCB

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IOENGINE, LLC,

Counterclaim Plaintiff,

v.

INGENICO, INC., INGENICO CORP., and  
INGENICO GROUP S.A.,

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Counterclaim Defendants.

**VOIR DIRE QUESTIONNAIRE**

**PLEASE DO NOT READ FURTHER OR WRITE ANYTHING ON  
THIS QUESTIONNAIRE UNTIL THE JUDGE TELLS YOU TO DO SO**

1. Do you have any personal knowledge of the legal claims in this case as I have described them or have you learned anything about the case through any source?
2. Have you ever heard of IOENGINE or Ingenico?
3. Have you or any immediate family member ever worked for or with, been employed by, or had any business or financial relationship with or investment in either IOENGINE or Ingenico?
4. Have you, a family member or a close friend ever worked for, had any dealings with, or a financial relationship with Fuji Film, Western Digital Corporation or SanDisk Corporation?
5. Are any members of your immediate family or anyone close to you related to or personally acquainted with any of these attorneys? Have any of them ever been represented by any of these attorneys or law firms?

**Smith, Katzenstein, & Jenkins LLP**

Neal Belgam  
Eve Ormerod

**Richards, Layton & Finger P.A.**

Fred Cottrell  
Christine Haynes

**Dechert LLP**

Noah Leibowitz  
Greg Chuebon  
Derek Brader  
Michael Joshi  
Luke Reilly

**Sunstein LLP**

Kerry Timbers  
Joel Leeman  
Sharona Sternberg  
Kevin Mosier

6. Are you familiar with any of the following potential witnesses in this case (listed in alphabetical order)?
  - Ryan Ahern
  - James Geier
  - Jeffrey Klenk
  - Scott McNulty
  - Christopher Rotsaert
  - Aviel D. Rubin
  - Tom Rzonca
  - Jeffrey A. Stec
  - Barry Sussman
  - Joey Tang
7. Have you or any member of your immediate family ever worked as a lawyer or in some other job in the legal field, or had any education or training in the law?
8. Have you or any member of your immediate family ever brought a lawsuit against anyone or been sued?
9. Have you or any member of your immediate family ever appeared as a witness at a trial or before a grand jury?
10. Have you ever served as a juror in a civil or criminal case?
11. Have you or any member of your immediate family had any education, training or work experience in computer science or electrical engineering?
12. Have you ever worked for a technology company?
13. Have you or any member of your immediate family or a close friend ever applied for a patent or been involved in a dispute about patent rights, been employed by the Patent and Trademark Office, or been involved in the negotiation of a patent license?
14. Do you have any strong feelings about patent rights or the Patent and Trademark Office?
15. Do you have strongly held opinions about whether either large corporations or small start-up companies behave ethically?
16. Look around at the other potential jury members. Did you know any of the others before today?

17. Is there anything that would prevent you from giving full attention to all the evidence at this trial or would make it difficult for you to serve on this jury? For example, do you have poor vision, difficulty hearing, or difficulty understanding spoken or written English?
18. Do you have a hardship that would make it difficult or impossible for you to serve on this jury?
19. Finally, is there any reason that you could not be a conscientious, fair, and impartial juror in this case and render a true and just verdict without fear, favor, sympathy, or prejudice according to the law as I will explain it to you?